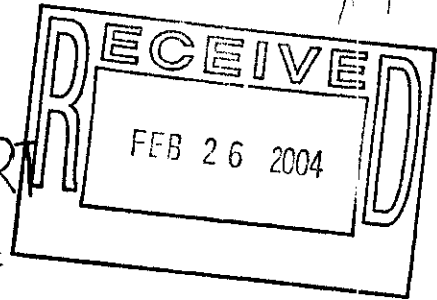


UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS



MARTIN L. SPENCE

PETITIONER, PRO SE ^{CIVIL NO:} 04-103
IMMIGRATION & NATURALIZATION SERVICE *Referred to MJ RA Colling*
RESPONDENT

APPLICATION FOR APPOINTMENT OF COUNSEL
PURSUANT TO 18 U.S.C. § 3006A(g)

PLEASE TAKE NOTICE THAT I AM THE PETITIONER IN THE ABOVE CAPTIONED CASE AND I AM UNABLE TO HIRE MY OWN ATTORNEY TO REPRESENT ME, DUE TO MY FINANCIAL SITUATION AS AN INS DETAINEE HERE, I HAVE WRITTEN AND CALL A FEW LEGAL ORGANIZATION REQUESTING THEIR HELP, BUT TO NO AVAIL.

MY REASON FOR ASKING THE COURT FOR APPOINTMENT OF COUNSEL IS BECAUSE MY CASE IS A VERY COMPLEX ONE AND I DO NOT HAVE THE EXPERTISE, RESOURCE NOR ANY ACCESS TO THE LAW LIBRARY HERE TO HELP MYSELF.

I DECLARE UNDER PENALTIES OF PERJURY THAT MY ANSWERS ARE TRUE TO THE BEST OF MY KNOWLEDGE.

DATED FEB 24, 2004

Martin L. Spence
SIGNATURE